FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

Marathon Ashland Petroleum LLC. Old State Road #69 South Mt. Vernon, Indiana 47620

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 129-13956-00006

Issued by: Original signed by Paul Dubenetzky

Paul Dubenetzky, Branch Chief

Office of Air Quality

Issuance Date: April 15, 2002

Expiration Date: April 15, 2007

Marathon Ashland Petroleum LLC.

Mt. Vernon, Indiana

Permit Reviewer: CJF/MES

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary source.

Authorized Individual: Patrick J. Barnes

Source Address: Old State Road #69 South, Mt. Vernon, Indiana 47620 Mailing Address: Old State Road #69 South, Mt. Vernon, Indiana 47620

General Source Phone Number: 317-244-9551

SIC Code: 5171 County Location: Posey

Source Location Status: Attainment for all criteria pollutants

Attainment for all other criteria pollutants

Source Status: Federally Enforceable State Operating Permit (FESOP)

Minor Source, under PSD Rules;

Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Distillate, gasoline, neat ethanol, asphalt, and slurry truck and barge loading/unloading facilities. Distillate will include kerosene,#2 fuel oil, #6 fuel oil, or other oil with a vapor pressure less than 1.5 psi.
- (b) One (1) distillate, gasoline, and/or neat ethanol loading rack, installed in 1954, equipped with one (1) carbon adsorber vapor recovery unit, installed in December 1995, and three (3) backup trailer mounted thermal incinerators.
- (c) One (1) distillate, gasoline, and/or neat ethanol liquid storage tank, known as 25-6, installed in 1953, equipped with an internal floating roof installed May 19, 1997, capacity: 1,028,958 gallons.
- (d) One (1) distillate, gasoline, and/or neat ethanol liquid storage tank, known as 25-8, installed in 1953, capacity: 939,246 gallons.
- (e) One (1) distillate, gasoline, and/or neat ethanol liquid storage tank, known as 55-4, installed in 1954, capacity: 2,099,748 gallons.
- (f) One (1) distillate, gasoline, and/or neat ethanol liquid storage tank, known as 55-9, installed in 1953, capacity: 2,092,146 gallons.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

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(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, rated at a total of 12.6 million British thermal units per hour, including:

Two (2) natural gas fired hot oil heaters, installed in April 1995, rated at: 6.3 million British thermal units per hour, each.

- (b) Combustion source flame safety purging on startup.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (e) Closed loop heating and cooling systems.
- (f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.
- (g) Process vessel degassing and cleaning to prepare for internal repairs.
- (h) Paved and unpaved roads and parking lots with public access.
- (i) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (j) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (k) Three (3) fixed roof storage tanks, used to store asphalt or slurry, identified as Tank 80-1, Tank 150-10, and Tank 150-11. Tank 80-1 has a storage capacity of 3,403,302 gallons of asphalt or slurry, and Tanks 150-10 and 150-11 have a storage capacity of 6,284,124 gallons of asphalt or slurry, each.
- (I) Three (3) fixed roof No. 2 fuel oil storage tanks, identified as Tank 25-2, Tank 25-3, and Tank 25-7. Tank 25-2 has a storage capacity of 1,033,368 gallons of No. 2 fuel oil, Tank 25-3 has a storage capacity of 1,028,202 gallons of No. 2 fuel oil, and Tank 25-7 has a storage capacity of 1,028,832 gallons of No.2 fuel oil.
- (m) One (1) fixed roof Transmix storage tank, identified as T-5, with a storage capacity of 33,180 gallons of Transmix.
- (n) Three (3) fixed roof gasoline additive storage tanks, identified as AA-10-1, AA-10-4, and AA-2-3. Tank AA-10-1 has a storage capacity of 8,400 gallons of gasoline additives, Tank AA-10-4 has a storage capacity of 11,340 gallons of gasoline additives, and Tank AA-2-3 has a storage capacity of 1,932 gallons of gasoline additives.
- (o) One (1) asphalt loading rack constructed in 1995.

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(p) One (1) fuel oil fired office furnace, installed in approximately 1990, rated at 0.138 million British thermal units per hour.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

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SECTION B

GENERAL CONDITIONS

Permit No Defense [IC 13] B.1

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

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B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

Permit Term [326 IAC 2-8-4(2)] B.3

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

Enforceability [326 IAC 2-8-6] **B.4**

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] B.8 [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management Permits Branch. Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual"

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as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - Ouring the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or.

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

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The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Marathon Ashland Petroleum LLC. Mt. Vernon, Indiana

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Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]
 - (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
 - (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
 - (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
 - (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC Marathon Ashland Petroleum LLC. Page 14 of 40 Mt. Vernon, Indiana OP No. F 129-13956-00006

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2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9] If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act:
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

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(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit:
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015 Marathon Ashland Petroleum LLC. Mt. Vernon, Indiana Permit Reviewer: CJF/MES Page 17 of 40 OP No. F 129-13956-00006

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

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SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable; (keep or delete as applicable)
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Any change or modification that increases the potential to emit PM to 250 tons per year or more shall cause this source to become a major source pursuant to 326 IAC 2-2, PSD, and shall require prior OAQ approval.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accord-

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ance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015 Marathon Ashland Petroleum LLC. Page 20 of 40 Mt. Vernon, Indiana OP No. F 129-13956-00006

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The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
 The Permittee shall comply with the applicable emission control procedures in 326 IAC 1410-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are
 applicable for any removal or disturbance of RACM greater than three (3) linear feet on
 pipes or three (3) square feet on any other facility components or a total of at least 0.75
 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
 The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator,
 prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to
 thoroughly inspect the affected portion of the facility for the presence of asbestos. The
 requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

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(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

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- (2)If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3)If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- The Permittee is not required to take any further response steps for any of the following (c) reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2)The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- When implementing reasonable steps in response to a compliance monitoring condition. (d) if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt

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corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The emission statement required by this permit shall be considered timely if the date post-marked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are

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available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Distillate, gasoline, neat ethanol, asphalt, and slurry truck and barge loading/unloading facilities. Distillate will include kerosene, #2 fuel oil, #6 fuel oil, or other oil with a vapor pressure less than 1.5 psi.
- (b) One (1) distillate, gasoline, and/or neat ethanol loading rack, installed in 1954, equipped with one (1) carbon adsorber vapor recovery unit, installed in December 1995, and three (3) backup trailer mounted thermal incinerators.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

The total annual throughput of gasoline and/or neat ethanol delivered to the truck loading rack and through the barge loading facilities shall be limited to 120,000,000 gallons or equivalent, per twelve (12) consecutive month period. For purposes of this VOC limit each gallon of gasoline loaded through the barge loading facilities shall be equivalent to 11.09 gallons of gasoline loaded through the truck loading rack. This will limit the VOC emissions from the loading rack, including truck losses of 4.50 tons of VOC per year, to 22.0 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]

Pursuant to 326 IAC 8-4-4 (Bulk gasoline terminals):

- (a) No owner or operator of a bulk gasoline terminal shall permit the loading of gasoline into any transport, excluding railroad tank cars, or barges, unless:
 - (1) The bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation and consisting of one of the following:
 - (A) An adsorber or condensation system which processes and recovers vapors and gases from the equipment being controlled, releasing no more than 80 milligrams per liter of VOC to the atmosphere.
 - (B) A vapor collection system which directs all vapors to a fuel gas system or incinerator.
 - (C) An approved control system, demonstrated to have control efficiency equivalent to or greater than clause (A) above.
 - (2) Displaced vapors and gases are vented only to the vapor control system.
 - (3) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
 - (4) All loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.

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(b) If employees of the owner of the bulk gasoline terminal are not present during loading, it shall be the responsibility of the owner of the transport to make certain the vapor control system is attached to the transport. The owner of the terminal shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this section.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-4-9]

Pursuant to 326 IAC 8-4-9 (Leaks from transports and vapor collection systems, records) the source will operate a vapor control system. The requirements are as follows:

- (a) This section is applicable to the following:
 - (1) All vapor balance systems and vapor control systems at sources subject to sections 4 through 6 of this rule.
 - (2) All gasoline transports subject to section 7 of this rule.
- (b) No person shall allow a gasoline transport that is subject to this rule and that has a capacity of two thousand (2,000) gallons or more to be filled or emptied unless the gasoline transport completes the following:
 - (1) Annual leak detection testing before the end of the twelfth calendar month following the previous year's test, according to test procedures--- contained in 40 CFR 63.425(e), as follows:
 - (A) Conduct the pressure and vacuum tests for the transport's cargo tank using a time period of five (5) minutes. The initial pressure for the pressure test shall be four hundred sixty (460) millimeters H_2O (eighteen (18) inches H_2O) gauge. The initial vacuum for the vacuum test shall be one hundred fifty (150) millimeters H_2O (six (6) inches H_2O) gauge. The maximum allowable pressure or vacuum change is twenty-five (25) millimeters H_2O (one (1) inch H_2O) in five (5) minutes.
 - (B) Conduct the pressure test of the cargo tank's internal vapor valve as follows:
 - (i) After completing the test under clause (A), use the procedures in 40 CFR 60, Appendix A, Method 27 to repressurize the tank to four hundred sixty (460) millimeters H₂O (eighteen (18) inches H₂O) gauge. Close the transport's internal vapor valve or valves, thereby isolating the vapor return line and manifold from the tank.
 - (ii) Relieve the pressure in the vapor return line to atmospheric pressure, then reseal the line. After five (5) minutes, record the gauge pressure in the vapor return line and manifold. The maximum allowable five (5) minute pressure increase is one hundred thirty (130) millimeters H₂O (five (5) inches H₂O).
 - (2) Repairs by the gasoline transport owner or operator, if the transport does not meet the criteria of subdivision (1), and retesting to prove compliance with the criteria of subdivision (1).
- (c) The annual test data remain valid until the end of the twelfth calendar month following the test. The owner of the gasoline transport shall be responsible for compliance with sub-

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section (b) and shall provide the owner of the loading facility with the most recent valid modified 40 CFR 60, Appendix A, Method 27 test results upon request. The owner of the loading facility shall take all reasonable steps, including reviewing the test date and tester's signature, to ensure that gasoline transports loading at its facility comply with subsection (b).

- (d) The owner or operator of a vapor balance system or vapor control system subject to this rule shall:
 - (1) design and operate the applicable system and the gasoline loading equipment in a manner that prevents:
 - (A) gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen (18) inches of H₂O) and a vacuum from exceeding one thousand five hundred (1,500) pascals (six (6) inches of H₂O) in the gasoline transport;
 - (B) except for sources subject to 40 CFR 60.503(b) (NESHAP/MACT) or 40 CFR 63. 425(a) (New Source Performance Standards) requirements, a reading equal to or greater than twenty-one thousand (21,000) parts per million as propane, from all points on the perimeter of a potential leak source when measured by the method referenced in 40 CFR 60, Appendix A, Method 21, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and
 - (C) avoidable visible liquid leaks during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and
 - (2) within fifteen (15) days, repair and retest a vapor balance, collection, or control system that exceeds the limits in subdivision (1).
- (e) The department may, at any time, monitor a gasoline transport, vapor balance, or vapor control system to confirm continuing compliance with subsection (b) or (c).
- (f) The owner or operator of a vapor balance or vapor control system subject to this section shall maintain records of all certification testing. The records shall identify the following:
 - (1) The vapor balance, vapor collection, or vapor control system.
 - (2) The date of the test and, if applicable, retest.
 - (3) The results of the test and, if applicable, retest.

The records shall be maintained in a legible, readily available condition for at least two (2) years after the date the testing and, if applicable, retesting were completed.

- (g) The owner or operator of a gasoline transport subject to this section shall keep a legible copy of the transport's most recent valid annual modified 40 CFR 60, Appendix A, Method 27 test either in the cab of the transport or affixed to the transport trailer. The test record shall identify the following:
 - (1) The gasoline transport.

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- (2) The type and date of the test and, if applicable, date of retest.
- (3) The test methods, test data, and results certified as true, accurate, and in compliance with this rule by the person who performs the test.

This copy shall be made available immediately upon request to the department and to the owner of the loading facility for inspection and review. The department shall be allowed to make copies of the test results.

- (h) If the commissioner allows alternative test procedures in subsection (b)(1) or (d)(1)(B), such method shall be submitted to the U.S. EPA as a SIP revision.
- (i) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in subsection (d)(1)(B). Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be as follows:
 - (1) Five hundred (500) parts per million methane for all bulk gas terminals subject to NESHAP/MACT (40 CFR 63, Subpart R).
 - (2) Ten thousand (10,000) parts per million methane for all bulk gas terminals subject to a New Source Performance Standard.

D.1.4 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]

- (a) The worst case single HAP emissions from the entire source shall not exceed a total of ten (10) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) The combination of HAPs emissions from <u>the entire source</u> shall not exceed a total of twenty-five (25.0) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.5 Hazardous Air Pollutants [326 IAC 20-1] [40 CFR Part 63, Subpart R]

The hazardous air pollutant emissions from the entire source shall be limited as follows to make the requirements of 40 CFR Part 63 Subpart R [National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)] not applicable.

The total annual throughput of gasoline and/or neat ethanol delivered to the truck loading rack and through the barge loading facilities shall be limited to 120,000,000 gallons or equivalent, per twelve (12) consecutive month period. For purposes of this limit each gallon of gasoline loaded through the barge loading facilities shall be equivalent to 11.09 gallons of gasoline loaded through the truck loading rack. This limitation is equivalent to both a potential to emit of less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of combined HAPs.

D.1.6 Nonapplicability of Standard for Volatile Organic Compounds (VOC's) [40 CFR 60.500 through 60.506, Subpart XX]

The requirement from F 129-5529-00006, issued December 12, 1996, Condition D.1.1, Standard for Volatile Organic Compounds (VOC's), has not been included in the renewal. This requirement is no longer applicable because Subpart XX is not applicable to the loading rack because the loading rack was constructed before the rule applicability date of December 17, 1980, and the

addition of the one (1) carbon adsorber vapor recovery unit, installed in 1995, is a control device, which does not constitute a modification. Thus, Condition D.1.1 of F 129-5529-00006 is hereby rescinded.

D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.8 VOC and HAPs

In order to comply with Conditions D.1.1, D.1.3, D.1.4 and D.1.5, the carbon adsorber vapor recovery unit, or the three (3) backup trailer mounted thermal incinerators for VOC and HAPs control shall be in operation and control emissions from the one (1) distillate, gasoline, and/or neat ethanol loading rack at all times when gasoline is loaded at the loading rack.

D.1.9 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

To demonstrate compliance with Condition D.1.2, a compliance stack test for VOC emissions shall be performed between April 23, 2002 and October 23, 2002 which corresponds to five (5) years since the latest valid stack test plus one hundred and eighty (180) days at the carbon adsorber vapor recovery unit. This test shall be performed according to 40 CFR 60, Appendix A, Methods 25 and 25A.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.10 Carbon Adsorber and Thermal Incinerator Operation

- (a) For the one (1) carbon adsorber, the Permittee shall perform daily checks of the key operating parameters, including bed pressure and vacuum level.
- (b) For the three (3) backup trailer mounted thermal incinerators, the Permittee shall perform daily checks of the key operating parameters, including pilot flame presence.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 the Permittee shall maintain records at the source of the throughput of gasoline and/or neat ethanol delivered to the loading rack;
- (b) To document compliance with Condition D.1.10 the Permittee shall maintain records of the following operation parameters of the carbon adsorber vapor recovery unit:
 - (1) bed pressure; and
 - (2) vacuum level.
- (c) To document compliance with Condition D.1.10 the Permittee shall maintain records of the pilot flame presence of any of the backup thermal incinerators when in use.
- (d) To document compliance with Condition D.1.4 and Condition D.1.5, the Permittee shall maintain records at the facility of the materials used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP usage limits and/or HAP emission limits that may be established in this permit. The records shall contain a minimum of the following:

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- (1) The HAP/VOC ratio of each fuel received;
- (2) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable; and
- (3) Identification of the facility or facilities associated with the usage of each HAP.
- (e) To document compliance with Condition D.1.3, the Permittee shall maintain records of the:
 - (1) Certification testing required under Condition D.1.3 (f), and
 - (2) Test required under Condition D.1.3 (g).

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.4 and D.1.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (c) One (1) distillate, gasoline, and/or neat ethanol liquid storage tank, known as 25-6, installed in 1953, equipped with an internal floating roof installed May 19, 1997, capacity: 1,028,958 gallons.
- (d) One (1) distillate, gasoline, and/or neat ethanol liquid storage tank, known as 25-8, installed in 1953, capacity: 939,246 gallons.
- (e) One (1) distillate, gasoline, and/or neat ethanol liquid storage tank, known as 55-4, installed in 1954, capacity: 2,099,748 gallons.
- (f) One (1) distillate, gasoline, and/or neat ethanol liquid storage tank, known as 55-9, installed in 1953, capacity: 2,092,146 gallons.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

The annual throughput of distillate, gasoline, and/or neat ethanol delivered to the loading rack shall be limited to 120,000,000 gallons. This limits the total VOC emissions from the above storage tanks to 33.1 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.2.2 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]

- (a) The worst case single HAP emissions from the entire source shall not exceed a total of ten (10) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) The combination of HAPs emissions from the entire source shall not exceed a total of twenty-five (25.0) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.

Compliance Determination Requirements

There are no specific Compliance Determination Requirements applicable to these emission units.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no specific Compliance Monitoring Requirements applicable to these emission units.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.3 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1 the Permittee shall maintain records at the source of the throughput of distillate, gasoline, and/or neat ethanol delivered to the loading rack:
- (b) To document compliance with Condition D.2.2, the Permittee shall maintain records at the facility of the materials used that contain any HAPs. The records shall be complete and

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sufficient to establish compliance with the HAP usage limits and/or HAP emission limits that may be established in this permit. The records shall contain a minimum of the following:

- (1) The HAP/VOC ratio of each fuel received;
- (2) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable; and
- (3) Identification of the facility or facilities associated with the usage of each HAP.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

D.2.4 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(o) One (1) asphalt loading rack constructed in 1995.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 New Source Performance Standards (326 IAC 12) (40 CFR 60.500 through 60.506, Subpart XX)
In order to make the requirements of New Source Performance Standards (326 IAC 12) (40 CFR 60.500 through 60.506, Subpart XX) not applicable, the source shall not load any liquid from the one (1) asphalt loading rack to a tank truck which has loaded gasoline on the immediately previous load.

Compliance Determination Requirements

There are no specific Compliance Determination Requirements applicable to these emission units.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no specific Compliance Monitoring Requirements applicable to these emission units.

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Marathon Ashland Petroleum LLC.

Source Address: Old State Road #69 South, Mt. Vernon, Indiana 47620 Mailing Address: Old State Road #69 South, Mt. Vernon, Indiana 47620

FESOP No.: F 129-13956-00006

| This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit. |
|---|
| Please check what document is being certified: |
| 9 Annual Compliance Certification Letter |
| 9 Test Result (specify) |
| 9 Report (specify) |
| 9 Notification (specify) |
| 9 Affidavit (specify) |
| 9 Other (specify) |
| |
| I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. |
| Signature: |
| Printed Name: |
| Title/Position: |
| Phone: |
| Date: |

Marathon Ashland Petroleum LLC. Mt. Vernon. Indiana

Permit Reviewer: CJF/MES

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

COMPLIANCE BRANCH 100 North Senate Avenue P.O. Box 6015 Indianapolis, Indiana 46206-6015 Phone: 317-233-5674 Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) EMERGENCY OCCURRENCE REPORT

Source Name: Marathon Ashland Petroleum LLC.

Source Address: Old State Road #69 South, Mt. Vernon, Indiana 47620 Mailing Address: Old State Road #69 South, Mt. Vernon, Indiana 47620

FESOP No.: F 129-13956-00006

This form consists of 2 pages

Page 1 of 2

| 9 | This is | s an | eme | rgency | as | defin | ed ir | า 326 | IAC | 2-7 | -1(12 |
|---|---------|------|-----|--------|----|-------|-------|-------|-----|-----|-------|
| | ^- | | _ | *** | | | | O .c. | | | |

CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and

CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

| Facility/Equipment/Operation: |
|---|
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency: |
| Describe the cause of the Emergency: |

If any of the following are not applicable, mark N/A

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| Date/Time Emergency started: |
|---|
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N Describe: |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |
| Form Completed by: |
| Title / Position: |
| Date: |

A certification is not required for this report.

Phone:

Marathon Ashland Petroleum LLC.

Mt. Vernon, Indiana

Permit Reviewer: CJF/MES

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY **COMPLIANCE DATA SECTION**

FESOP Quarterly Report

| Source Name: | Marathon Ashland Petroleum LLC. |
|-----------------|---|
| Source Address: | Old State Road #69 South, Mt. Vernon, Indiana |

47620 Mailing Address: Old State Road #69 South, Mt. Vernon, Indiana 47620

FESOP No.: F 129-13956-00006

One (1) distillate, gasoline, and/or neat ethanol loading rack and barge loading Facilities:

facilities

9

Parameter: **HAPs**

A total of 120,000,000 gallons of gasoline and/or neat ethanol, or equivalent, loaded Limit:

through the truck loading rack and the barge loading facilities. For purpose of this limit each gallon of gasoline and/or neat ethanol loaded through the barge facilities shall be equal to 11.09 gallons of gasoline and /or neat ethanol loaded through the truck rack. This limit is equivalent to HAPs emissions of less than ten (10) tons per

year for any single HAP and less than twenty-five (25) tons per year for the

combination of HAPs YEAR: _____

| Month | Gasoline and/or neat ethanol (gal) | Gasoline and/or neat ethanol (gal) | Gasoline and/or neat ethanol (gal) |
|-------|------------------------------------|------------------------------------|------------------------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

| 9 | No (| deviation | occurred | ın | this | quarter |
|---|------|-----------|----------|----|------|---------|
|---|------|-----------|----------|----|------|---------|

Deviation/s occurred in this quarter.

| Devi | Deviation has been reported on: | | | | | | |
|-------------------|---------------------------------|--|--|--|--|--|--|
| Submitted by: | | | | | | | |
| Title / Position: | | | | | | | |
| _ | | | | | | | |

Signature:

Date:

Phone:

Marathon Ashland Petroleum LLC. Mt. Vernon. Indiana

Permit Reviewer: CJF/MES

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

FESOP Quarterly Report

| Source Name: | Marathon | Ashland | Petroleum | LLC. |
|--------------|----------|---------|-----------|------|
| | | | | |

Source Address: Old State Road #69 South, Mt. Vernon, Indiana 47620 Mailing Address: Old State Road #69 South, Mt. Vernon, Indiana 47620

FESOP No.: F 129-13956-00006

Facilities: One (1) distillate, gasoline, and/or neat ethanol loading rack and barge loading

facilites

Parameter: VOC

Limit: A total of 120,000,000 gallons of gasoline and/or neat ethanol, or equivalent, loaded

through the truck loading rack and the barge loading facilities. For purpose of this limit each gallon of gasoline and/or neat ethanol loaded through the barge facilities shall be equal to 11.09 gallons of gasoline and /or neat ethanol loaded through the truck rack. This limit is equivalent to VOC emissions of less than one-hundred (100)

tons per year.

9

Date:

YEAR: _____

| Month | Gasoline and/or neat ethanol (gal) | Gasoline and/or neat ethanol (gal) | Gasoline and/or neat ethanol (gal) |
|-------|------------------------------------|------------------------------------|------------------------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

No deviation occurred in this quarter.

| 9 | Deviation/s occurred in this quarter. Deviation has been reported on: |
|-------------|--|
| Submitted I | oy: |

Signature:

Title / Position:

oignature.

Phone:

Attach a signed certification to complete this report.

Marathon Ashland Petroleum LLC.

Mt. Vernon, Indiana Permit Reviewer: CJF/MES

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY **COMPLIANCE BRANCH**

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) **QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Marathon Ashland Petroleum LLC.

Source Address: Old State Road #69 South, Mt. Vernon, Indiana 47620 Mailing Address: Old State Road #69 South, Mt. Vernon, Indiana 47620

| FESOP No.: | F 129-13956 | 3-00006 | | | | |
|--|------------------|---------------------|-------------------|-------------|--|--|
| | Months: | to | Year: | | | |
| | | | | Page 1 of 2 | | |
| This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period". | | | | | | |
| 9 NO DEVIATI | ONS OCCURRE | ED THIS REPORTI | NG PERIOD. | | | |
| 9 THE FOLLO | WING DEVIATION | ONS OCCURRED T | HIS REPORTING P | ERIOD | | |
| Permit Requir | ement (specify p | permit condition #) | | | | |
| Date of Deviat | ion: | | Duration of Devia | ition: | | |
| Number of De | viations: | | | | | |
| Probable Caus | se of Deviation: | | | | | |
| Response Ste | ps Taken: | | | | | |
| Permit Requirement (specify permit condition #) | | | | | | |
| Date of Deviat | ion: | | Duration of Devia | ition: | | |
| Number of Deviations: | | | | | | |
| Probable Caus | se of Deviation: | | | | | |
| Response Steps Taken: | | | | | | |

Marathon Ashland Petroleum LLC. Mt. Vernon, Indiana Permit Reviewer: CJF/MES Page 40 of 40 OP No. F 129-13956-00006

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| Permit Requirem | ent (specify permit condition #) | | | | | |
|---|----------------------------------|------------------------|--|--|--|--|
| Date of Deviation | 1: | Duration of Deviation: | | | | |
| Number of Devia | tions: | | | | | |
| Probable Cause | of Deviation: | | | | | |
| Response Steps | Taken: | | | | | |
| Permit Requirem | ent (specify permit condition #) | | | | | |
| Date of Deviation | n: | Duration of Deviation: | | | | |
| Number of Devia | tions: | | | | | |
| Probable Cause | of Deviation: | | | | | |
| Response Steps | Taken: | | | | | |
| Permit Requirem | ent (specify permit condition #) | | | | | |
| Date of Deviation | ı: | Duration of Deviation: | | | | |
| Number of Devia | tions: | | | | | |
| Probable Cause | of Deviation: | | | | | |
| Response Steps | Taken: | | | | | |
| | | | | | | |
| 9 No deviation occurred in this quarter. | | | | | | |
| 9 Deviation/s occurred in this quarter. Deviation has been reported on: | | | | | | |
| Form Completed By: | | | | | | |
| | Title/Position: | | | | | |
| | Date: | | | | | |
| Phone: | | | | | | |

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

Marathon Ashland Petroleum LLC.
Old State Road #69 South, Mt. Vernon, Indiana 47620

F 129-13956, Plt ID 129-00006

On October 31, 2001, the Office of Air Quality (OAQ) had a notice published in the Mount Vernon Democrat, Mount Vernon, Indiana, stating that Marathon Ashland Petroleum LLC. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a petroleum products distribution source with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 9, 2001, William J. Day submitted comments on the proposed FESOP Renewal. The summary of the comments is as follows:

Comment 1:

The facility is currently able to both receive and load products by barge. This includes gasoline, distillates, and asphalt. In my application letter, I had requested the new permit more accurately describe the permissible barge loading. I suggested the equivalent VOC emission limit of 18.4 tons (120,000,000 gallons of controlled gasoline loading at the truck rack) be allowed for loading gasoline at the barge. This would equate to 10,824,000 gallons of gasoline without controls. The barge loading of distillate, neat ethanol, or asphalt would not be limited, as the VOC's are insignificant. I do not see this detailed in the draft.

Response 1:

Change 1: To better clarify the permissible barge loading operations at the source, and to reflect the fact that distillate throughput does not need to be limited, the following changes to Conditions D.1.1, D.1.5, and D.1.11 have been made:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

The total annual throughput of distillate, gasoline and/or neat ethanol delivered to the truck loading rack and through the barge loading facilities shall be limited to 120,000,000 gallons or equivalent, per twelve (12) consecutive month period. For purposes of this VOC limit each gallon of gasoline loaded through the barge loading facilities shall be equivalent to 11.09 gallons of gasoline loaded through the truck loading rack. This will limit the VOC emissions from the loading rack to 18.4 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.5 Hazardous Air Pollutants [326 IAC 20-1] [40 CFR Part 63, Subpart R]

The hazardous air pollutant emissions from the entire source shall be limited as follows to make the requirements of 40 CFR Part 63 Subpart R [National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)] not applicable.

Marathon Ashland Petroleum LLC. Mt Vernon, Indiana

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The total input of distillate, gasoline and/or neat ethanol to the entire source is limited to 120,000,000 gallons per consecutive twelve (12) monthly rolling period. The total annual throughput of gasoline and/or neat ethanol delivered to the truck loading rack and through the barge loading facilities shall be limited to 120,000,000 gallons or equivalent, per twelve (12) consecutive month period. For purposes of this limit each gallon of gasoline loaded through the barge loading facilities shall be equivalent to 11.09 gallons of gasoline loaded through the truck loading rack. This limitation is equivalent to both a potential to emit of less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of combined HAPs.

D.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 the Permittee shall maintain records at the source of the throughput of distillate, gasoline and/or neat ethanol delivered to the loading rack:
- Change 2: The quarterly report forms have been changed as shown in the last two (2) pages of this document:

Comment 2:

D.1.8 is requested to be revised to "at all times when gasoline is loaded at the loading rack".

Response 2:

The control device is only needed to operate while loading gasoline to the loading rack. Therefore, condition D.1.8 has been revised as follows:

D.1.8 VOC and HAPs

In order to comply with Conditions D.1.1, D.1.3, D.1.4 and D.1.5, the carbon adsorber vapor recovery unit, or the three (3) backup trailer mounted thermal incinerators for VOC and HAPs control shall be in operation and control emissions from the one (1) distillate, gasoline, and/or neat ethanol loading rack at all times **when gasoline** is **loaded at** the loading rack. is in operation.

Comment 3:

D.1.10(b) and D.1.11(c)(2) are requested to have the requirement to measure the exit gas velocity eliminated.

Response 3:

The measurement of the exit gas velocity at the three (3) backup incinerators was not included in the original FESOP and is not required by the IDEM/OAQ. Therefore, this requirement has been deleted in Conditions D.1.10(b) and D.11(c)(2) as follows:

D.1.10 Carbon Adsorber and Thermal Incinerator Operation

(b) For the three (3) backup trailer mounted thermal incinerators, the Permittee shall perform daily checks of the key operating parameters, including pilot flame presence and exit gas velocity.

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D.1.11 Record Keeping Requirements

- (c) To document compliance with Condition D.1.10 the Permittee shall maintain records of the **pilot flame presence** following operation parameters of any of the backup thermal incinerators when in use.
 - (1) pilot flame presence; and
 - (2) exit gas velocity.

Comment 4:

On February 4, 2002, DeAnne Redman of Marathon Ashland Petroleum called requesting that slurry also be stored with asphalt at the three (3) insignificant storage tanks, identified as Tank 80-1, Tank 150-10, and Tank 150-11. These tanks will still not be subject to the New Source Performance Standard Subparts K, Ka, or Kb because even though the storage capacity of each tank is greater than 40,000 gallons, these tanks store asphalt and/or slurry, not petroleum liquid, as defined in these subparts.

Response 4:

Section A.3(k) has been revised as follows:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(k) Three (3) fixed roof asphalt storage tanks, used to store asphalt or slurry, identified as Tank 80-1, Tank 150-10, and Tank 150-11. Tank 80-1 has a storage capacity of 3,403,302 gallons of asphalt or slurry, and Tanks 150-10 and 150-11 have a storage capacity of 6,284,124 gallons of asphalt or slurry, each.

Comment 5:

On February 7, 2002, DeAnne Redman of Marathon Ashland Petroleum submitted a letter requesting that slurry also be loaded and unloaded at the barge loading facility. The increase in emissions from the loading and unloading of slurry are negligible.

Response 5:

Sections A.2(a) and D.1 have been revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) Distillate, gasoline, neat ethanol, asphalt, **and slurry** truck and barge loading/unloading facilities. Distillate will include kerosene,#2 fuel oil, #6 fuel oil, or other oil with a vapor pressure less than 1.5 psi.

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SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Distillate, gasoline, neat ethanol, asphalt, **and slurry** truck and barge loading/unloading facilities. Distillate will include kerosene, #2 fuel oil, #6 fuel oil, or other oil with a vapor pressure less than 1.5 psi.
- (b) One (1) distillate, gasoline, and/or neat ethanol loading rack, installed in 1954, equipped with one (1) carbon adsorber vapor recovery unit, installed in December 1995, and three (3) backup trailer mounted thermal incinerators.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Upon further review, the OAQ has decided to make the following changes to the FESOP renewal. The permit language is changed to read as follows (deleted language appears as strikeouts, new language is **bolded**):

Change 1:

Condition A.5 Prior Permits Superseded replaced Prior Permit Conditions in the proposed permit to implement the intent of the new rule 326 IAC 2-1.1-9.5 as follows:

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

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Change 2:

The IDEM, OAQ, has revised Condition B.15 Deviations from Permit Requirements and Conditions of the permit to address concerns regarding the independent enforceability of permit conditions [see 326 IAC 2-8-4(5)]. Condition B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and do does not need to be included in this report.

The notification by the Permittee Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

Change 3:

326 IAC 2-8-3 requires any application form, report, or compliance certification to be certified by the Authorized Individual. IDEM, OAQ has revised Condition C.7 Asbestos Abatement Projects to clarify that the asbestos notification does not require a certification by the authorized individual, but it does need to be certified by the owner or operator. IDEM, OAQ has revised Condition C.15 Actions Related to Noncompliance Demonstrated by a Stack Test; a certification by the authorized individual is required for the notification sent in response to non-compliance with a stack test.

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C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 1410-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are
applicable for any removal or disturbance of RACM greater than three (3) linear feet on
pipes or three (3) square feet on any other facility components or a total of at least 0.75
cubic feet on all facility components.

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(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator,
prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M,
is federally enforceable.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition **do** not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Change 4:

The IDEM, OAQ has restructured Condition C.14 to clarify the contents and implementation of the compliance response plan. The name of the condition has been changed to better reflect the contents of the condition. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. References to this condition throughout the proposed permit have been revised to reflect the name change of this condition as follows: The proposed condition has been changed as follows:

C.14 Compliance Monitoring Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to **prepare** implement: a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

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- (1) This condition;
- (2) The Compliance Determination Requirements in Section D of this permit;
- (3) The Compliance Monitoring Requirements in Section D of this permit;
- (4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
- (5) A a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ, (and local agency if applicable). The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, and maintained on site, and is comprised of:
 - (A)(1) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows: Failure to take reasonable response steps may constitute a violation of the permit.
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall

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be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the The Permittee is excused from taking not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (d)(e) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e)(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed at all times when the equipment emission unit is operating, except for time necessary to perform quality assurance and maintenance activities. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in

Section D.

In light of this, all references in the permit to "Compliance Monitoring Plan" have been changed to "Compliance Response Plan."

Change 5:

In order to more accurately portray the potential to emit after controls from the loading rack, emissions from truck losses should be included instead of losses from insignificant tanks 80-1, 25-2, and 25-3. The original FESOP had these three (3) tanks and the loading rack combined to get the equivalent potential emissions after controls of 18.4 tons per year. The 120,000,000 gallons per year throughput limit of gasoline to the rack is equivalent to 17.5 tons per year of VOC. The emissions from truck losses are 4.5 tons per year. Therefore, the emissions after controls reflecting the loading rack throughput limit are 22.0 tons per year and not 18.4 tons per year. The potential to emit after controls table in the TSD as well as Condition D.1.1 have been revised as follows:

| | Potential to Emit After Issuance (tons/year) | | | | | | |
|---|--|------------------|-----------------|-----------------------------|------|-----------------|---|
| Process/emission unit | PM | PM ₁₀ | SO ₂ | voc | СО | NO _x | HAPS |
| Loading Rack | | | | 18.4 22.0 | | | 3.77 |
| Tank 25-6 | | | | 3.40 | | | 0.567 |
| Tank 25-8 | | | | 9.47 | | | 1.58 |
| Tank 55-4 | | | | 10.0 | | | 1.71 |
| Tank 55-9 | | | | 10.2 | | | 1.74 |
| Insignificant Tanks, 150-10, 150-11, and 80-1 | | | | 0.0016 | | | negligible |
| Insignificant Tanks 25-2, 25-3, 25-7 | | | | 1.70 | | | 0.017 |
| Insignificant Tanks T-5, AA- 10-1, AA-10-4, AA-2-3 | | | | 8.67 | | | 1.47 |
| Other Insignificant Activities | 5.00 | 5.00 | 0.032 | 0.297 | 4.53 | 5.47 | 0.102 |
| Total Emissions | 5.00 | 5.00 | 0.032 | 62.1 65.7 | 4.53 | 5.47 | Single less than 10 Total less than 25 |

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D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

The total annual throughput of gasoline and/or neat ethanol delivered to the truck loading rack and through the barge loading facilities shall be limited to 120,000,000 gallons or equivalent, per twelve (12) consecutive month period. For purposes of this VOC limit each gallon of gasoline loaded through the barge loading facilities shall be equivalent to 11.09 gallons of gasoline loaded through the truck loading rack. This will limit the VOC emissions from the loading rack, **including truck losses of 4.50 tons of VOC per year,** to 18.4 22.0 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE BRANCH

FESOP Quarterly Report

| Source Name: | Marathon Ashland Petroleum LLC. |
|-----------------|--|
| Course Address: | Old State Dood #60 South Mt Versen Ind |

Source Address: Old State Road #69 South, Mt. Vernon, Indiana 47620 Mailing Address: Old State Road #69 South, Mt. Vernon, Indiana 47620

FESOP No.: F 129-13956-00006

Facilities: One (1) distillate, gasoline, and/or neat ethanol loading rack and barge loading facilities

and four (4) storage tanks

Parameter: Distillate, gasoline, and/or neat ethanol loaded HAPs

Limit: 120,000,000 gallons of distillate, gasoline, and/or neat ethanol per twelve (12)

consecutive month period, A total of 120,000,000 gallons of gasoline and/or neat ethanol, or equivalent, loaded through the truck loading rack and the barge loading facilities. For purpose of this limit each gallon of gasoline and/or neat ethanol loaded through the barge facilities shall be equal to 11.09 gallons of gasoline and /or neat ethanol loaded through the truck rack. This limit is equivalent to HAPs emissions of less than ten (10) tons per year for any single HAP and less than twenty-five

(25) tons per year for the combination of HAPs

YEAR: ____

| Month | Distillate, Gasoline and/or neat ethanol (gal) | Distillate, Gasoline and/or neat ethanol (gal) | Distillate, Gasoline and/or neat ethanol (gal) |
|-------|---|---|---|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

| 9 | Deviation/s occurred in this quarter. |
|---|---------------------------------------|
| | Deviation has been reported on: |

| Submitted by: | |
|-------------------|--|
| Title / Position: | |
| Signature: | |
| Date: | |
| Phone: | |

Attach a signed certification to complete this report.

Marathon Ashland Petroleum LLC. Mt Vernon, Indiana

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE BRANCH

FESOP Quarterly Report

| Source Name: | Marathon Ashland Petroleum LLC. | |
|-----------------|---|-------|
| Source Address: | Old State Road #69 South, Mt. Vernon, Indiana | 47620 |
| | | |

Mailing Address: Old State Road #69 South, Mt. Vernon, Indiana 47620

FESOP No.: F 129-13956-00006

Phone:

Facilities: One (1) distillate, gasoline, and/or neat ethanol loading rack and barge loading facilities

and four (4) storage tanks

Parameter: Distillate, gasoline, and/or neat ethanol loaded VOC

Limit: 120,000,000 gallons of Distillate, gasoline, and/or neat ethanol per twelve (12)

consecutive month period, A total of 120,000,000 gallons of gasoline and/or neat ethanol, or equivalent, loaded through the truck loading rack and the barge loading facilities. For purpose of this limit each gallon of gasoline and/or neat ethanol loaded through the barge facilities shall be equal to 11.09 gallons of gasoline and /or neat ethanol loaded through the truck rack. This limit is equivalent to VOC

emissions of less than one-hundred (100) tons per year.

YEAR:

| Month | Distillate, Gasoline and/or neat ethanol (gal) | Distillate, Gasoline and/or neat ethanol (gal) | Distillate, Gasoline and/or neat ethanol (gal) |
|-------|---|---|---|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

| 9 | Nο | deviation | occurred | in | this | quarter. |
|---|----|-----------|----------|----|------|----------|
|---|----|-----------|----------|----|------|----------|

| eviation/s occurred in this quarter. eviation has been reported on: |
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| , |

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: Marathon Ashland Petroleum LLC.

Source Location: Old State Road #69 South, Mt. Vernon, Indiana 47620

County: Posey SIC Code: 5171

Operation Permit No.: F 129-13956-00006
Permit Reviewer: Craig J. Friederich

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Marathon Ashland Petroleum LLC. relating to the operation of a petroleum products distribution source. Marathon Ashland Petroleum LLC. was issued FESOP 129-5529-00006, on December 12, 1996.

Permitted Emission Units and Pollution Control Equipment

- (a) Distillate, gasoline, neat ethanol, and asphalt truck and barge loading/unloading facilities. Distillate will include kerosene, #2 fuel oil, #6 fuel oil, or other oil with a vapor pressure less than 1.5 psi.
- (b) One (1) distillate, gasoline, and/or neat ethanol loading rack, installed in 1954, equipped with one (1) carbon adsorber vapor recovery unit, installed in December 1995, and three (3) backup trailer mounted thermal incinerators.
- (c) One (1) distillate, gasoline, and/or neat ethanol liquid storage tank, known as 25-6, installed in 1953, equipped with an internal floating roof installed May 19, 1997, capacity: 1,028,958 gallons.
- (d) One (1) distillate, gasoline, and/or neat ethanol liquid storage tank, known as 25-8, installed in 1953, capacity: 939,246 gallons.
- (e) One (1) distillate, gasoline, and/or neat ethanol liquid storage tank, known as 55-4, installed in 1954, capacity: 2,099,748 gallons.
- (f) One (1) distillate, gasoline, and/or neat ethanol liquid storage tank, known as 55-9, installed in 1953, capacity: 2,092,146 gallons.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, rated at a total of 12.6 million British thermal units per hour, including:
 - Two (2) natural gas fired hot oil heaters, installed in April 1995, rated at: 6.3 million British thermal units per hour, each.
- (b) Combustion source flame safety purging on startup.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (e) Closed loop heating and cooling systems.
- (f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.
- (g) Process vessel degassing and cleaning to prepare for internal repairs.
- (h) Paved and unpaved roads and parking lots with public access.
- (i) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (j) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (k) Three (3) fixed roof asphalt storage tanks, identified as Tank 80-1, Tank 150-10, and Tank 150-11. Tank 80-1 has a storage capacity of 3,403,302 gallons of asphalt, and Tanks 150-10 and 150-11 have a storage capacity of 6,284,124 gallons of asphalt, each.
- (I) Three (3) fixed roof No. 2 fuel oil storage tanks, identified as Tank 25-2, Tank 25-3, and Tank 25-7. Tank 25-2 has a storage capacity of 1,033,368 gallons of No. 2 fuel oil, Tank 25-3 has a storage capacity of 1,028,202 gallons of No. 2 fuel oil, and Tank 25-7 has a storage capacity of 1,028,832 gallons of No.2 fuel oil.
- (m) One (1) fixed roof Transmix storage tank, identified as T-5, with a storage capacity of 33,180 gallons of Transmix.
- (n) Three (3) fixed roof gasoline additive storage tanks, identified as AA-10-1, AA-10-4, and AA-2-3. Tank AA-10-1 has a storage capacity of 8,400 gallons of gasoline additives, Tank AA-10-4 has a storage capacity of 11,340 gallons of gasoline additives, and Tank AA-2-3 has a storage capacity of 1,932 gallons of gasoline additives.

- (o) One (1) asphalt loading rack constructed in 1995.
- (p) One (1) fuel oil fired office furnace, installed in approximately 1990, rated at 0.138 million British thermal units per hour.

Existing Approvals

- (a) FESOP 129-5529-00006, issued on December 12, 1996; and expires on December 12, 2001, and
- (b) AAF 129-9225-00006, issued December 19, 1997.

All conditions from previous approvals were incorporated into this FESOP except the following:

Condition D.1.1(c), from F 129-5529-00006, issued on December 12, 1996, which stated that:

D.1.1 Volatile Organic Compounds

(c) Pursuant to the New Source Performance Standards (326 IAC 12) (40 CFR 60.500 through 60.506, Subpart XX), emissions from the vapor collection system are limited to no more than 35 milligrams of total organic compounds per liter of gasoline loaded. This limit also satisfies the 80 milligrams per liter of VOC to the atmosphere limit of 326 IAC 8-4-4, Bulk Gasoline Terminals.

has not been carried over because Subpart XX is not applicable to the loading rack. This loading rack was constructed before the rule applicability date of December 17, 1980, and the addition of the one (1) carbon adsorber vapor recovery unit, installed in 1995, is a control device, which does not constitute a modification.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on February 23, 2001.

There was no notice of completeness letter mailed to the source.

Emission Calculations

The calculations submitted by the applicant for have been verified and found to be accurate and correct. The source requested a limit of 120,000,000 gallons throughput on their tank line in their original FESOP application. Marathon Ashland Petroleum has not requested any changes in this renewal, therefore, this limit will not change. The potential to emit has changed because the updated TANKS 4.0 program was run using 100 turnovers for the tanks, which is higher than in the original FESOP. See Appendix A (page 1 through 4 of 4) of this document for detailed insignificant

combustion emissions calculations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

| Pollutant | Unrestricted Potential Emissions (tons/year) |
|------------------|--|
| PM | 0.00 |
| PM ₁₀ | 0.00 |
| SO ₂ | 0.00 |
| VOC | 500 |
| СО | 0.00 |
| NO_X | 0.00 |

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

| HAPs | Unrestricted Potential Emissions (tons/year) |
|------------------------|--|
| Hexane | 7.89 |
| Benzene | 4.44 |
| Toluene | 6.42 |
| 2,2,4 Trimethylpentane | 3.95 |
| Xylenes | 2.48 |
| Ethyl benzene | 0.490 |
| MTBE | 58.7 |
| TOTAL HAPs | 84.4 |

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 12, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. The source has not constructed any new emission units, but did run an updated version of TANKS 4.0 to reflect the current potential to emit.

| | | | Potential t | o Emit After (tons/year) | Issuance | | |
|---|------|------------------|-----------------|-----------------------------|----------|-----------------|---|
| Process/emission unit | PM | PM ₁₀ | SO ₂ | voc | со | NO _x | HAPs |
| Loading Rack | 1 | | | 18.4 | 1 | | 3.77 |
| Tank 25-6 | - | | | 3.40 | - | | 0.567 |
| Tank 25-8 | 1 | | | 9.47 | 1 | | 1.58 |
| Tank 55-4 | | | | 10.0 | | | 1.71 |
| Tank 55-9 | 1 | | | 10.2 | 1 | | 1.74 |
| Insignificant Tanks, 150-10, 150-11, and 80-1 | 1 | | | 0.0016 | ł | | negligible |
| Insignificant Tanks 25-2, 25-3, 25-7 | I | | | 1.70 | I | | 0.017 |
| Insignificant Tanks T-5, AA- 10-1, AA-10-4, AA-2-3 | I | | | 8.67 | l | | 1.47 |
| Other Insignificant Activities | 5.00 | 5.00 | 0.032 | 0.297 | 4.53 | 5.47 | 0.102 |
| Total Emissions | 5.00 | 5.00 | 0.032 | 62.1 | 4.53 | 5.47 | Single less than 10 Total less than 25 |

County Attainment Status

The source is located in Posey County.

| Pollutant | Status |
|------------------|------------|
| PM ₁₀ | Attainment |
| SO ₂ | Attainment |
| NO ₂ | Attainment |
| Ozone | Attainment |
| СО | Attainment |
| Lead | Attainment |

Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Posey County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) The three (3) distillate, gasoline, and/or neat ethanol liquid storage tanks, identified as 25-8, 55-4, and 55-9, installed in 1953 and 1954, predate the Subpart K, Ka, and Kb applicability dates of June 11, 1973, May 18, 1978, and July 25, 1984 respectively. Therefore, these tanks are not subject to the requirements of these subparts.
- (b) The one (1) distillate, gasoline, and/or neat ethanol liquid storage tank, identified as 25-6, installed in 1953, is not subject to the requirements of 40 CFR 60.116b, Subpart Kb, because this tank was installed prior to the rule applicability date of July 23,1984. The addition in 1997 of an internal floating roof, is not considered a modification because the potential to emit did not increase. Also, the addition of the internal floating roof is not considered a reconstruction because the installation cost was less than 50% of the replacement cost of the tank.
- (c) The one (1) distillate, gasoline, and/or neat ethanol loading rack, installed in 1954, equipped with one (1) carbon adsorber vapor recovery unit, installed in December 1995, and three (3) backup trailer mounted thermal incinerators, is not subject to the requirements of the New Source Performance Standards (326 IAC 12) (40 CFR 60.500 through 60.506, Subpart XX) because this loading rack was constructed before the rule applicability date of December 17, 1980, and the addition of the one (1) carbon adsorber vapor recovery unit, installed in 1995, is a control device, which does not constitute a modification.
- (d) This source will still not be subject to Gasoline Distribution NESHAP 40 CFR Part 63, Subpart R, Gasoline Distribution. Marathon Ashland Petroleum LLC. has agreed to limit the input of gasoline to the entire source to 120,000,000 gallons per twelve (12) consecutive month period. This limits the emissions of HAPs to below the major source levels of ten (10) tons per year for any given individual HAP and twenty-five (25) tons per year for the combination of all HAPs. Therefore, the requirements of this rule do not apply.
- (e) The one (1) asphalt loading rack, installed in 1995, which is classified as an insignificant activity, is not subject to the requirements of the New Source Performance Standards (326)

IAC 12) (40 CFR 60.500 through 60.506, Subpart XX) because this rack does not deliver liquid to gasoline tank trucks. The source shall not load any liquid from this rack to a tank truck which has loaded gasoline on the immediately previous load.

- (f) The three (3) fixed roof asphalt storage tanks, identified as Tank 80-1, Tank 150-10, and Tank 150-1, which are classified as insignificant activities, are not subject to the requirements of New Source Performance Standard subparts K, Ka, or Kb because even though the storage capacity of each tank is greater than 40,000 gallons, these tanks store asphalt, not petroleum liquid, as defined in these subparts.
- (g) The three (3) fixed roof No. 2 fuel oil storage tanks, identified as Tank 25-2, Tank 25-3, and Tank 25-7, which are classified as insignificant activities, are not subject to the requirements of New Source Performance Standard subparts K, Ka, or Kb because even though the storage capacity of each tank is greater than 40,000 gallons, these tanks store No. 2 fuel oil, which is not a not petroleum liquid, as defined in these subparts.
- (h) The one (1) fixed roof Transmix storage tank, identified as T-5, and the three (3) fixed roof gasoline additive storage tanks, identified as AA-10-1, AA-10-4, and AA-2-3 which are classified as insignificant activities, are not subject to the requirements of New Source Performance Standard subparts K, Ka, or Kb because the storage capacity of each tank is less than 40,000 gallons.

State Rule Applicability - Entire Source

326 IAC 2-4.1-1 (New Source Toxics Control)

There are no facilities located at this source that were constructed after July 27, 1997. Therefore, 326 IAC 2-4.1-1 is not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Posey County and the potential to emit all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM_{10} , SO_2 , VOC, CO and NO_X shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

326 IAC 5-1 (Visible Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continu-

ous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

- (a) The three (3) distillate, gasoline, and/or neat ethanol liquid storage tanks, identified as 25-8, 55-4, and 55-9, installed in 1953 and 1954, are not subject to the requirements of 326 IAC 8-4-3 because each was constructed prior to the rule applicability date of January 1, 1980.
- (b) The one (1) distillate, gasoline, and/or neat ethanol liquid storage tank, identified as 25-6, installed in 1953, is not subject to the requirements of 326 IAC 8-4-3 because this tank was installed prior to the rule applicability date of January 1, 1980. The 1997 addition of an internal floating roof is not considered a modification because the potential to emit did not increase. Also, the addition of the internal floating roof is not considered a reconstruction because the installation cost was less than 50% of the replacement cost of the tank.

326 IAC 8-4-4 (Bulk Gasoline Terminals)

This source is subject to the requirements of 326 IAC 8-4-4 because the source loads gasoline into trucks and therefore must control VOC emissions with an adsorber or condensation system. This rule requires that:

- (a) No owner or operator of a bulk gasoline terminal shall permit the loading of gasoline into any transport, excluding railroad tank cars, or barges, unless:
 - (1) The bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation and consisting of one of the following:
 - (A) An adsorber or condensation system which processes and recovers vapors and gases from the equipment being controlled, releasing no more than 80 milligrams per liter of VOC to the atmosphere.
 - (B) A vapor collection system which directs all vapors to a fuel gas system or incinerator.
 - (C) An approved control system, demonstrated to have control efficiency equivalent to or greater than clause (A) above.
 - (2) Displaced vapors and gases are vented only to the vapor control system.
 - (3) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
 - (4) All loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.
- (b) If employees of the owner of the bulk gasoline terminal are not present during loading, it shall be the responsibility of the owner of the transport to make certain the vapor control system is attached to the transport. The owner of the terminal shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this section.

The one (1) distillate, gasoline, and/or neat ethanol loading rack with one (1) carbon adsorber vapor recovery unit and three (3) backup trailer mounted thermal incinerators complies with this rule.

326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems; Records)

This source is subject to the requirements of 326 IAC 8-4-9 because the source operates a vapor control system. The requirements are as follows:

- (a) This section is applicable to the following:
 - (1) All vapor balance systems and vapor control systems at sources subject to sections 4 through 6 of this rule.
 - (2) All gasoline transports subject to section 7 of this rule.
- (b) No person shall allow a gasoline transport that is subject to this rule and that has a capacity of two thousand (2,000) gallons or more to be filled or emptied unless the gasoline transport completes the following:
 - (1) Annual leak detection testing before the end of the twelfth calendar month following the previous year's test, according to test procedures contained in 40 CFR 63.425 (e), as follows:
 - (A) Conduct the pressure and vacuum tests for the transport's cargo tank using a time period of five (5) minutes. The initial pressure for the pressure test shall be four hundred sixty (460) millimeters H_2O (eighteen (18) inches H_2O) gauge. The initial vacuum for the vacuum test shall be one hundred fifty (150) millimeters H_2O (six (6) inches H_2O) gauge. The maximum allowable pressure or vacuum change is twenty-five (25) millimeters H_2O (one (1) inch H_2O) in five (5) minutes.
 - (B) Conduct the pressure test of the cargo tank's internal vapor valve as follows:
 - (i) After completing the test under clause (A), use the procedures in 40 CFR 60, Appendix A, Method 27 to repressurize the tank to four hundred sixty (460) millimeters H₂O (eighteen (18) inches H₂O) gauge. Close the transport's internal vapor valve or valves, thereby isolating the vapor return line and manifold from the tank.
 - (ii) Relieve the pressure in the vapor return line to atmospheric pressure, then reseal the line. After five (5) minutes, record the gauge pressure in the vapor return line and manifold. The maximum allowable five (5) minute pressure increase is one hundred thirty (130) millimeters H₂O (five (5) inches H₂O).
 - (2) Repairs by the gasoline transport owner or operator, if the transport does not meet the criteria of subdivision (1), and retesting to prove compliance with the criteria of subdivision (1).
- (c) The annual test data remain valid until the end of the twelfth calendar month following the test. The owner of the gasoline transport shall be responsible for compliance with subsection (b) and shall provide the owner of the loading facility with the most recent valid modified

40 CFR 60, Appendix A, Method 27 test results upon request. The owner of the loading facility shall take all reasonable steps, including reviewing the test date and tester's signature, to ensure that gasoline transports loading at its facility comply with subsection (b).

- (d) The owner or operator of a vapor balance system or vapor control system subject to this rule shall:
 - (1) design and operate the applicable system and the gasoline loading equipment in a manner that prevents:
 - (A) gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen (18) inches of H_2O) and a vacuum from exceeding one thousand five hundred (1,500) pascals (six (6) inches of H_2O) in the gasoline transport;
 - (B) except for sources subject to 40 CFR 60.503(b) (NESHAP/MACT) or 40 CFR 63. 425(a) (New Source Performance Standards) requirements, a reading equal to or greater than h- twenty-one thousand (21,000) parts per million as propane, from all points on the perimeter of a potential leak source when measured by the method referenced in 40 CFR 60, Appendix A, Method 21, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and
 - (C) avoidable visible liquid leaks during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and
 - within fifteen (15) days, repair and retest a vapor balance, collection, or control system that exceeds the limits in subdivision (1).
- (e) The department may, at any time, monitor a gasoline transport, vapor balance, or vapor control system to confirm continuing compliance with subsection (b) or (c).
- (f) The owner or operator of a vapor balance or vapor control system subject to this section shall maintain records of all certification testing. The records shall identify the following:
 - (1) The vapor balance, vapor collection, or vapor control system.
 - (2) The date of the test and, if applicable, retest.
 - (3) The results of the test and, if applicable, retest.

The records shall be maintained in a legible, readily available condition for at least two (2) years after the date the testing and, if applicable, retesting were completed.

- (g) The owner or operator of a gasoline transport subject to this section shall keep a legible copy of the transport's most recent valid annual modified 40 CFR 60, Appendix A, Method 27 test either in the cab of the transport or affixed to the transport trailer. The test record shall identify the following:
 - (1) The gasoline transport.
 - (2) The type and date of the test and, if applicable, date of retest.

(3) The test methods, test data, and results certified as true, accurate, and in compliance with this rule by the person who performs the test.

This copy shall be made available immediately upon request to the department and to the owner of the loading facility for inspection and review. The department shall be allowed to make copies of the test results.

- (h) If the commissioner allows alternative test procedures in subsection (b)(1) or (d)(1)(B), such method shall be submitted to the U.S. EPA as a SIP revision.
- (i) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in subsection (d)(1)(B). Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be as follows:
 - (1) Five hundred (500) parts per million methane for all bulk gas terminals subject to NESHAP/MACT (40 CFR 63, Subpart R).
 - (2) Ten thousand (10,000) parts per million methane for all bulk gas terminals subject to a New Source Performance Standard.

Testing Requirements

All testing requirements from previous approvals were incorporated into this FESOP. The compliance stack test for VOC emissions shall be performed between April 23, 2002 and October 23, 2002 which corresponds to five (5) years since the latest valid stack test plus one hundred and eighty (180) days at the carbon adsorber vapor recovery unit to demonstrate compliance with 326 IAC 8-4-4. These tests shall be performed according to 40 CFR 60, Appendix A, Methods 25 and 25A.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

The one (1) distillate, gasoline, and/or neat ethanol loading rack, equipped with one (1) carbon adsorber vapor recovery unit, and three (3) backup trailer mounted thermal incinerators has applicable compliance monitoring conditions as specified below:

- (a) For the one (1) carbon adsorber, daily checks of the key operating parameters, including the bed pressure and vacuum level.
- (b) For the three (3) backup trailer mounted thermal incinerator, daily checks of the key operating parameters, including pilot flame presence, and exit gas velocity.

These monitoring conditions are necessary to comply with 326 IAC 2-8 and 326 IAC 8-4-4.

Conclusion

The operation of this a petroleum products distribution source shall be subject to the conditions of the attached proposed FESOP No.: F 129-13956-00006.

Appendix A: Emissions Calculations Natural Gas Combustion Only MM BTU/HR <100 Natural Gas Boiler

Company Name: Marathon Ashland Petroleum LLC.

Address City IN Zip: Old State Road #69 South, Mt. Vernon, IN 47620

FESOP: F 129-13956 Plt ID: 129-00006

Reviewer: Craig J. Friederich Date: February 23, 2001

Heat Input Capacity Potential Throughput

MMBtu/hr MMCF/yr

12.3000 107.75

Pollutant

| | PM* | PM10* | SO2 | NOx | VOC | СО | |
|-------------------------------|-------|-------|-------|-------------|-------|------|--|
| Emission Factor in lb/MMCF | 1.9 | 7.6 | 0.6 | 100.0 | 5.5 | 84.0 | |
| | | | | **see below | | | |
| Potential Emission in tons/yr | 0.102 | 0.409 | 0.032 | 5.39 | 0.296 | 4.53 | |

^{*}PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

^{**}Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Page 2 of 4 TSD App A

Appendix A: Emissions Calculations Natural Gas Combustion Only MM BTU/HR <100 Natural Gas Boiler HAPs Emissions

Company Name: Marathon Ashland Petroleum LLC.

Address City IN Zip: Old State Road #69 South, Mt. Vernon, IN 47620

FESOP: F 129-13956 Plt ID: 129-00006

Reviewer: Craig J. Friederich
Date: February 23, 2001

HAPs - Organics

| Emission Factor in lb/MMcf | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
|-------------------------------|----------|-----------------|--------------|----------|----------|
| | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr | 1.13E-04 | 6.46E-05 | 4.04E-03 | 9.70E-02 | 1.83E-04 |

HAPs - Metals

| Emission Factor in lb/MMcf | Lead | Cadmium | Chromium | Manganese | Nickel | Total |
|-------------------------------|----------|----------|----------|-----------|----------|-------|
| | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 | HAPs |
| Potential Emission in tons/yr | 2.69E-05 | 5.93E-05 | 7.54E-05 | 2.05E-05 | 1.13E-04 | 0.102 |

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations Page 3 of 4 TSD App A Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr) #1 and #2 Fuel Oil

Company Name: Marathon Ashland Petroleum LLC.

Address City IN Zip: Old State Road #69 South, Mt. Vernon, IN 47620

FESOP: F 129-13956 Plt ID: 129-00006

Reviewer: Craig J. Friederich
Date: February 23, 2001

Heat Input Capacity Potential Throughput S = Weight % Sulfur MMBtu/hr kgals/year

0.138 8.63485714

| | Pollutant | | | | | |
|-------------------------------|-----------|----------|-------|-------|-------|--|
| | PM* | SO2 | NOx | VOC | CO | |
| Emission Factor in lb/kgal | 2.0 | 0 | 20.0 | 0.34 | 5.0 | |
| | | (142.0S) | | | | |
| Potential Emission in tons/yr | 0.009 | 0.000 | 0.086 | 0.001 | 0.022 | |

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file) *PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emission calculations.

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Appendix A: Emissions Calculations Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr) #1 and #2 Fuel Oil HAPs Emissions

Company Name: Marathon Ashland Petroleum LLC.

Address, City IN Zip: Old State Road #69 South, Mt. Vernon, IN 47620

CP: F 129-13956 Plt ID: 129-00006

Reviewer: Craig J. Friederich
Date: February 23, 2001

HAPs - Metals

| Emission Factor in lb/mmBtu | Arsenic | Beryllium | Cadmium | Chromium | Lead |
|-------------------------------|----------|-----------|----------|----------|----------|
| | 4.0E-06 | 3.0E-06 | 3.0E-06 | 3.0E-06 | 9.0E-06 |
| Potential Emission in tons/yr | 2.42E-06 | 1.81E-06 | 1.81E-06 | 1.81E-06 | 5.44E-06 |

HAPs - Metals (continued)

| Emission Factor in lb/mmBtu | Mercury | Manganese | Nickel | Selenium | Total |
|-------------------------------|----------|-----------|----------|----------|----------|
| | 3.0E-06 | 6.0E-06 | 3.0E-06 | 1.5E-05 | HAPs |
| Potential Emission in tons/yr | 1.81E-06 | 3.63E-06 | 1.81E-06 | 9.07E-06 | 2.96E-05 |

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton